

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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In re:

Wisconsin & Milwaukee Hotel LLC,

Debtor.

Case No. 24-21743-gmh  
Chapter 11

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**DECLARATION OF GARY KUNESH  
IN SUPPORT OF PREPETITION RESERVATIONS MOTION**

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I, Gary Kunesh, hereby declare as follows:

1. I am VP Financial Planning & Analysis for White Lodging Services Corp. (the “**Admin Manager**”). The Admin Manager is the manager of Wisconsin & Milwaukee Hotel LLC, the debtor herein (“**Debtor**” or “**WMH**”).
2. I am part of the team that manages the Debtor’s business, and have access to the Debtor’s operational books and records.
3. I make this declaration in support of the Debtor’s Motion for Authority To Honor Prepetition Reservations and Deposits, and to Pay Prepetition Credit Card Commissions (the “**Prepetition Reservations Motion**”) [Doc 20].
4. On April 15, 2024, I caused to be generated a schedule, by customer, of all advance payment deposits made on account of rooms or events at WMH through April 9, 2024. That schedule is attached hereto as Exhibit A, with personally identifiable information redacted (the “**Deposits Schedule**”).

5. The Deposits Schedule shows that on a customer-by-customer basis (except for a few group reservations discussed below), the advance payment deposits do not exceed \$3,350 per person.

6. In connection with group reservations, when the total deposit for each group or event is divided by the number of guests for whom rooms are reserved, the advance payment deposits do not exceed \$3,350 per person, with the exception of a few cases indicated at the end of the Deposits Schedule. Those cases relate to reservations in connection with an event which is scheduled to be held in Milwaukee during July 2024.

7. The deposits in the case of the group reservations were calculated on the basis of the projected spending by the group, in addition to the room revenues, and they are non-refundable. I have serious concerns about the potential damage to the Debtor's reputation, as well as to the City of Milwaukee and the Marriott brand, if those deposits are not able to be credited to the stays. The groups could refuse to pay any additional charges owed, litigation could ensue, and negative publicity could severely damage the Hotel's future bookings and earnings prospects.

### **Declaration**

Pursuant to 28 U.S.C. § 1746, I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 15th day of April, 2024.

  
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Gary Kunesh

# EXHIBIT A

Marriott Milwaukee Deposit Listing

Name	Arrival	Ave/Guest	
		Amount (\$)	# of guests (*) (\$)*
*****	04/10/24	469.24	
*****	04/11/24	941.20	
*****	04/12/24	376.10	
*****	04/12/24	376.10	
*****	04/13/24	482.21	
*****	04/13/24	409.92	
*****	04/13/24	458.63	
*****	04/13/24	321.21	
*****	04/13/24	368.94	
*****	04/15/24	509.09	
*****	04/15/24	258.20	
*****	04/16/24	809.97	
*****	04/16/24	939.66	
*****	04/16/24	281.78	
*****	04/17/24	317.15	
*****	04/19/24	319.69	
*****	04/21/24	279.63	
*****	04/22/24	1,162.49	
*****	04/23/24	317.15	
*****	04/24/24	504.61	
*****	04/25/24	246.41	
*****	04/25/24	798.18	
*****	04/26/24	516.67	
*****	04/26/24	634.30	
*****	04/29/24	258.20	
*****	05/01/24	528.19	
*****	05/01/24	352.52	
*****	05/03/24	247.97	
*****	05/04/24	239.52	
*****	05/04/24	240.52	
*****	05/09/24	247.35	
*****	05/10/24	659.42	
*****	05/11/24	329.71	
*****	05/11/24	624.07	
*****	05/16/24	246.41	
*****	05/16/24	1,127.12	
*****	05/16/24	247.97	
*****	05/16/24	1,033.37	
*****	05/17/24	551.77	
*****	05/17/24	537.43	
*****	05/17/24	599.68	
*****	05/17/24	246.41	
*****	05/17/24	492.82	
*****	05/17/24	492.82	
*****	05/17/24	259.56	
*****	05/17/24	492.82	
*****	05/17/24	221.77	
*****	05/17/24	539.98	
*****	05/17/24	539.98	
*****	05/18/24	289.62	
*****	05/18/24	268.72	
*****	05/18/24	246.41	
*****	05/18/24	294.66	
*****	05/18/24	269.99	
*****	05/18/24	269.99	
*****	05/19/24	246.41	
*****	05/19/24	246.41	
*****	05/19/24	246.41	
*****	05/24/24	268.72	
*****	05/24/24	268.72	
*****	05/24/24	599.28	
*****	05/24/24	309.66	
*****	05/24/24	739.23	
*****	05/25/24	246.41	
*****	05/25/24	246.41	
*****	06/03/24	258.20	
*****	06/03/24	989.61	
*****	06/07/24	349.75	
*****	06/08/24	423.26	
*****	06/09/24	998.61	
*****	06/09/24	998.61	
*****	06/14/24	634.30	
*****	06/15/24	808.73	
*****	06/15/24	838.80	
*****	06/15/24	309.66	
*****	06/20/24	834.73	
*****	06/20/24	364.31	
*****	06/20/24	364.31	
*****	06/20/24	1,257.99	
*****	06/20/24	1,163.67	
*****	06/20/24	364.31	
*****	06/21/24	446.84	
*****	06/21/24	423.26	
*****	06/21/24	423.26	
*****	06/21/24	380.94	
*****	06/21/24	719.42	
*****	06/21/24	905.47	
*****	06/21/24	417.37	
*****	06/22/24	899.68	

Marriott Milwaukee Deposit Listing

Name	Arrival	Amount (\$)	# of guests (*)	Ave/Guest (\$)*
*****	06/22/24	399.68		
*****	06/22/24	399.68		
*****	06/22/24	435.05		
*****	06/22/24	470.42		
*****	06/27/24	517.58		
*****	06/28/24	399.68		
*****	06/28/24	399.68		
*****	06/28/24	846.52		
*****	06/28/24	846.52		
*****	06/28/24	399.68		
*****	06/28/24	435.05		
*****	06/28/24	435.05		
*****	06/28/24	359.72		
*****	06/28/24	893.68		
*****	06/28/24	719.42		
*****	06/28/24	399.68		
*****	06/29/24	399.68		
*****	06/29/24	399.68		
*****	06/29/24	423.26		
*****	06/29/24	423.26		
*****	06/29/24	423.26		
*****	06/29/24	399.68		
*****	06/29/24	399.68		
*****	07/05/24	988.00		
*****	07/05/24	352.52		
*****	07/06/24	352.52		
*****	07/07/24	269.99		
*****	07/19/24	3,094.87		
*****	07/20/24	2,141.06		
*****	07/20/24	2,235.38		
*****	07/20/24	2,117.48		
*****	07/22/24	3,305.35		
*****	07/22/24	3,305.35		
*****	07/22/24	3,305.35		
*****	07/23/24	2,434.63		
*****	07/23/24	2,434.63		
*****	07/23/24	2,434.63		
*****	07/24/24	547.06		
*****	07/24/24	547.06		
*****	07/24/24	1,858.10		
*****	07/24/24	1,858.10		
*****	07/25/24	1,387.68		
*****	07/25/24	1,387.68		
*****	07/25/24	1,476.12		
*****	07/25/24	999.79		
*****	07/25/24	1,340.52		
*****	07/25/24	1,446.63		
*****	07/25/24	1,340.52		
*****	07/26/24	517.58		
*****	07/26/24	517.58		
*****	07/27/24	2,223.61		
*****	07/27/24	2,223.61		
*****	07/27/24	2,178.33		
*****	07/27/24	2,178.33		
*****	07/28/24	341.35		
*****	07/28/24	372.47		
*****	07/31/24	352.52		
*****	08/12/24	352.52		
*****	08/12/24	352.52		
*****	08/16/24	610.72		
*****	08/16/24	610.72		
*****	08/25/24	1,609.33		
*****	08/25/24	1,609.33		
*****	08/25/24	1,609.33		
*****	10/02/24	547.94		
*****	10/02/24	547.94		
*****	10/10/24	951.45		
*****	11/23/24	269.99		
*****	07/04/24	159,566.00	15	10,637.73
*****	07/03/24	369,837.20	45	8,218.60
*****	07/08/24	237,200.00	60	3,953.33
*****	07/08/24	132,637.52	25	5,305.50
*****	07/08/24	29,250.00	13	2,250.00
*****	08/12/24	5,404.10	70	77.20
*****	03/05/24	2,483.93	0	
*****	06/14/24	700.00	8	87.50
*****	05/24/24	500.00	40	12.50
*****	05/30/24	400.00	35	11.43
*****	10/17/24	1,400.00	0	
*****	05/24/24	1,200.00	21	57.14
*****	07/14/24	35,334.63	10	3,533.46
*****	07/16/24	400.00	0	
*****	07/16/24	15,000.00	0	

1,109,065.21

(\*) used for group events to estimate the average deposits per guest